

AFFIDAVIT OF WINSTON JOHNSON

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STATE OF MICHIGAN)
)ss
COUNTY OF WAYNE)

I, Winston Johnson, first being duly sworn, state the following:

1. I have personal knowledge of the following facts, and if called as a witness I would be competent to testify as to these facts.

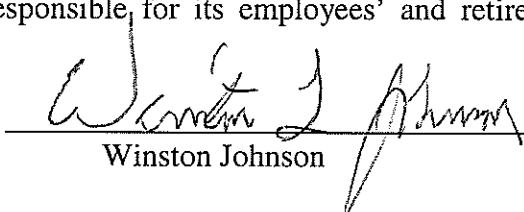
2. I was hired by the Detroit Public Library in 1972. I retired in 2006. I held numerous positions, and retired as Senior Clerk. I never worked for the City of Detroit. I received a pension and retiree healthcare upon retirement from the Library, and I gained access to my annuity savings fund. I was president of AFSCME Local 1259 from 1980-2004, and currently work for Michigan AFSCME Council 25 as a staff representative for the two AFSCME Library locals.

3. I recently received a ballot and other information from the Bankruptcy Court presiding over Detroit's bankruptcy, spelling out that my pension and annuity savings fund were being impaired. I also was told that my retiree healthcare group plan was ending and that I would receive a stipend of \$125/month.

4. AFSCME Council 25 has two locals at the Detroit Public Library, Locals 1259 and Local 1231. In Local 1259 there are ninety-eight (98) members currently, and they serve in the positions of Library clerks, technical services assistants, customer support assistants, janitors and one mechanic. The average pay is around \$32,000 per year, and they all work full time. Local 1231 is a mixture of full and part time employees, totaling 91 employees currently. All of these employees are customer support representatives. Their standard hourly wage is \$11 per hour; the full time employees make about \$22,880 annually, and the part time employees make between \$10,000 and \$12,000 annually. There are approximately 100 retirees of both locals.

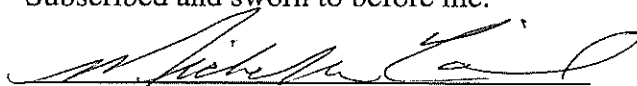
5. It is my experience and understanding that the Library is independent of the City of Detroit and is solely responsible for its employees' and retirees' pension (including ASF) and OPEB benefits.

Further affiant sayeth not.


Winston Johnson

8/1/14
Date

Subscribed and sworn to before me:


Michelle Coil, Notary Public
St. Clair County, Acting in Wayne County, MI
My Commission expires: 10/21/2015

MICHELLE COIL
NOTARY PUBLIC, STATE OF MI
COUNTY OF ST. CLAIR
MY COMMISSION EXPIRES Oct 21, 2015
ACTING IN THE COUNTY OF Wayne